Sharkey, John

From: Tom Richardson [tomrr@h2owell.com]
Sent: Wednesday, April 04, 2007 10:55 AM

To: Sharkey, John

Subject: Tom Richardson: Comments on March 30 Draft

From: Tom Richardson

Sent: Wednesday, April 04, 2007 9:32 AM

To: 'johnsharkey@idwr.idaho.gov'

Subject: regs

Hi John,

As you stated in our phone call this is a little late but here are some suggestions.

Definitions

- 01. Abandoned well is a well no longer in use or in disrepair.
- 02. Decommissioned well the act of taking a well out of service or filling to protect the water source.
- 30. Liner needs to allow for sealing.
- 47. Thermoplastic pipe just call it PVC but define it as thermoplastic pipe.
- 57. Well rig- should be Drill Rig nobody calls it a well rig.

030

01. Delete thermoplastic should not be here.

031.

01. Throw your chart out and base it on well diameter not depth (sometimes we don't how deep we are going) .250 up to 12", std wall after that.

040. call it PVC

01.

- a. Do not need sch 80 for a twenty foot monitor well. Delete sch 80. require sch 80 if well depth exceeds 200 feet.
- b. delete all

050.

Rewrite entire section. I like Washington's. see attachment.

- 052. Throw out the table of Rule 53. Dry chip above static water level only. Pressure grout below static water level.
- 053. Delete too confusing.
- 080. call it decommissioning.
- 096. Air development and testing are fine for domestic wells.

325

Permits should be valid for a period of one year from date of issue. Not the current ten day window which is impossible to adhere to.

This is a very brief overview there is a lot of things that need to be cleaned up and simplified.

Thanks for all your work. It is appreciated

Tom Richardson
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